

THE HONORABLE JAMES L. ROBERT

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

PROMEDEV, LLC dba RELIEF FACTOR

Plaintiff,

v.

ROBY WILSON (individual) and
MAXXIMEDIA ADVERTISING CO; and
IMAGIPIX CORPORATION.

Defendants.

Case No. 2:22-CV-01063-JLR

**STIPULATED MOTION AND
~~[PROPOSED]~~ ORDER FOR
EXTENSION OF TIME TO FILE
PRETRIAL ORDER**

NOTING DATE: APRIL 16, 2024

WHEREAS, on February 12, 2024, the Court entered a Minute Order Setting Trial Dates and Related Deadlines, including a deadline of April 16, 2024 for the parties to submit an agreed Pretrial Order and to submit deposition designations. Dkt. #80.

WHEREAS, on April 1, 2024 the Court entered partial summary judgment, dismissing Promedev's claim for civil coercion, extortion, or blackmail and dismissing Maxximedia's claims for copyright infringement, breach of the implied covenant of good faith and fair dealing, and trade secret misappropriation. Dkt. #93. On April 12, 2024, the Court further dismissed Maxximedia's claim for breach of contract. Dkt. #111. The Court is still considering Maxximedia's motion for summary judgment with respect to Promedev's breach of contract claim, and on April 12, 2024, ordered further briefing from the parties on that issue. Dkt. #112.

AND WHEREAS, Promedev and Defendants have worked in good faith to revise the

1 agreed Pretrial Order, including to reduce the witnesses and exhibits each party expects will be
 2 necessary at trial. The parties agree that such witnesses and exhibits may further be reduced,
 3 depending on the Court's forthcoming ruling with respect to Promedev's breach of contract
 4 claim. The parties therefore agree that a short extension of time to file the agreed Pretrial Order
 5 would be beneficial to the efficient administration of this case, and to reduce unnecessary
 6 witnesses and exhibits, and that such extension shall not delay the proceeding or the trial date.

7 Accordingly, all parties respectfully request that the Court enter an order extending the
 8 time for the parties to submit the proposed Pretrial Order and deposition designations to April
 9 19, 2024.

10 IT IS SO STIPULATED.

11 Respectfully submitted this 16th day of April, 2024.

12 DLA PIPER LLP (US)

KLINEDINST PC

13 /s/ Austin Rainwater

/s/ Louiza Dudin

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Promedev LLC dba Relief Factor

Attorneys for Defendants
Roby Wilson, MaXXiMedia Advertising
Co., and Imagipix Corporation

~~**PROPOSED**~~ **ORDER**

The Court hereby grants the Parties' Stipulated Motion for Extension of Time to File Pretrial Order and to submit deposition designations to April 19, 2024.

IT IS SO ORDERED on this 17th day of April, 2024.



The Honorable James L. Robart
United States District Judge